

LINDA TIRELLI  
COUNSEL FOR DEBTOR  
202 MAMARONECK AVEUNE, 3<sup>RD</sup> FLOOR  
WHITE PLAINS, NEW YORK 10601  
PH(914) 946-0860

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN THE MATTER OF**

**REPLIQUE D'AMELIO  
DEBTOR**

**CHAPTER 13  
CASE NO: 10-36642 (CGM)**

**NOTICE OF :  
OBJECTION TO PROOF OF  
CLAIM #11-1 FILED BY  
CITIMORTGAGE, INC.  
AND  
REQUEST FOR ACCOUNTING  
AND OPPORTUNITY FOR  
HEARING**

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**NOTICE OF OBJECTION TO PROOF OF CLAIM  
AND REQUEST FOR ACCOUNTING  
AND NOTICE OF OPPORTUNITY FOR HEARING**

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**TO: CITIMORTGAGE, INC.**

**PLEASE TAKE NOTICE** that an Objection to Proof of Claim has been filed by the debtors named above. A copy of the objection accompanies this notice.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

**TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested by the debtors in their motion, or if you want the Court to consider your views on the motion, then on or before **September 21, 2010**, you or your attorney must do three (3) things:

1. **File with the court a written response requesting that the Court hold a hearing and explaining your position. File the response at:**

United States Bankruptcy Court  
Southern District of New York  
355 Main Street

Poughkeepsie, NY

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

**2. On or before the date stated above for written responses, you must also mail or fax a copy of your written request to:**

Linda M. Tirelli, Esq.,  
Counsel for the Debtor  
Law Offices of Linda M.Tirelli  
202 Mamaroneck Avenue, 3<sup>rd</sup> Floor  
White Plains, NY 10601

Jeffrey Sapir, Esq.  
Chapter 13 Trustee  
399 Knollwood Road  
White Plains, NY 10603

Greg Zipes, Esq.  
US Dept of Justice  
Office of the US Trustee  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, NY 10004

**3. You must also attend the hearing scheduled for TUESDAY, OCTOBER 5, 2010 at 10:45 a.m. in Courtroom Number at the United States Bankruptcy Court, 355 Main Street, Poughkeepsie, NY 10601.**

If you or your attorney do not take these steps, **A HEARING WILL NOT BE HELD** and the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

This the 17<sup>th</sup> Day of August, 2010.

/S/ Linda M. Tirelli  
Linda M. Tirelli, Esq.,  
Counsel for the Debtor  
Law Offices of Linda M.Tirelli  
202 Mamaroneck Avenue, 3<sup>rd</sup> Floor  
White Plains, NY 10601  
PH (914)946-0860  
Fax(914)946-0870

**CERTIFICATE OF SERVICE**

Linda M. Tirelli, attorney for the debtor, hereby certifies to the Court as follows:

1. I am not a party for the foregoing proceeding;
2. I am not less than 18 years of age;
3. I have this day served a copy of the foregoing

**OBJECTION TO PROOF OF CLAIM;**

**PROPOSED ORDER DISALLOWING CLAIM BY CITIMORTGAGE, INC.;**

**NOTICE OF MOTION OBJECTING TO PROOF OF CLAIM; AND**

**NOTICE OPPORTUNITY FOR HEARING**

on all parties in interest by placing the same in an envelope, first-class mail, postage prepaid, addressed to each person at his dwelling house or usual place of abode or to the place where he regularly conducts his business or profession as follows:

CitiMortgage, Inc.  
PO Box 140609  
Irving, TX 75019-0609

**And via the Court's Electronic Case Filing System to:**

Jeffrey Sapir, Esq.  
Chapter 13 Trustee  
399 Knollwood Road  
White Plains, NY 10603

United States Department of Justice  
Office of United States Trustee  
Southern District of New York  
Attn: Attorney Greg Zipes, UST  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, NY 10004

4. To the best of my knowledge, information and belief, the parties in interest are not infants or incompetent persons;

5. Service as outlined herein was made within the United States of America.

This the 17<sup>th</sup> Day of August, 2009.

/S/ Linda M. Tirelli

Linda M. Tirelli, Esq.,  
Counsel for the Debtor  
Law Offices of Linda M. Tirelli  
202 Mamaroneck Avenue, 3<sup>rd</sup> Floor  
White Plains, NY 10601  
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